

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ASHOT EGIAZARYAN

v.

PETER ZALMAYEV

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: 11 Civ. 02670 (PKC)(GWG)
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**DEFENDANT'S RESPONSES TO PLAINTIFF'S
SECOND SET OF INTERROGATORIES TO DEFENDANT**

Defendant Peter Zalmayev responds to plaintiff Ashot Egiazaryan's second set of interrogatories as follows:

INTERROGATORY NO. 1:

Identify the source(s) of all payments to National Immigration Law Group PLLC, Baker & Hostetler LLP, Hamburg & Golden, P.C., Salisbury & Ryan LLP, Muranov, Chernyakov & Partners, Elena Korovina, The Sperduto Law Firm, PLC and any other entity or individual representing or providing legal services now or in the past to Mr. Zalmayev, Eurasia Democracy Initiative and/or Rinat Akhmetshin in connection with the defense or prosecution of this action and/or any work concerning Mr. Egiazaryan.

RESPONSE TO INTERROGATORY NO. 1:

The source of Eurasia Democracy Initiative's ("EDI") \$1,200 paid to Zhanna Snelbecker of National Immigration Law Group PLLC (see Zalmayev's privilege log) is Andrey Vavilov. Mr. Vavilov paid Rinat Akhmetshin, who paid EDI.

The source of payments to Hamburg & Golden, P.C., Salisbury & Ryan LLP, Muranov, Chernyakov & Partners, Ruben Markayan and King & Spalding International LLP for legal work concerning this case or Mr. Egiazaryan is Andrey Vavilov.

Mr. Zalmayev's knowledge of payments to The Sperduto Law Group is from Mr. Akhmetshin's deposition, where he testified that he made payments for legal fees to The Sperduto Law Firm, PLC using his own money, although he hopes to be reimbursed by Andrey Vavilov. Rinat Akhmetshin deposition transcript at 159. Mr. Zalmayev is not aware of the source of any other payments by Mr. Akhmetshin, if any, for legal services to him concerning Mr. Egiazaryan.

Mr. Zalmayev's counsel has determined that Baker & Hostetler was paid by Mr. Akhmetshin, who was reimbursed for that payment by Mr. Vavilov.

Mr. Zalmayev is not aware of any payments made to Elena Korovina.

/s/ Andrew J. Ryan

Andrew J. Ryan

Matthew P. Feser

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/s/ James P. Golden

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Attorneys for Defendant

Peter Zalmayev

Dated: April 17, 2012

CERTIFICATE OF SERVICE

I, James P. Golden, certify that a copy of the foregoing response to plaintiff's second set of interrogatories was served by email on April 18, 2012, on

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Attorneys for Plaintiff

/s/ James P. Golden
JAMES P. GOLDEN

Date: April 18, 2012